

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**IN RE INTEL CORP. MICROPROCESSOR  
LITIGATION**

**MDL Docket No. 05-1717-JJF**

This Pleading Pertains to:

JIM KIDWELL, MARY REEDER, JOHN MAITA, JWRE, INC., CHRYSTAL MOELLER, and CARESSE HARMS, on their own behalves and on behalf of all others similarly situated,

Case No. 05-470-JJF

Plaintiffs,

vs.

INTEL CORPORATION, A DELAWARE CORPORATION,

Defendant.

ROBERT J. RAINWATER, KATHY ANN CHAPMAN, and SONIA YACO, on their own behalves and on behalf of all others similarly situated,

Case No. 05-473-JJF

Plaintiffs,

vs.

INTEL CORPORATION, A DELAWARE CORPORATION,

Defendant.

Additional captions continue on following pages

**THE NATIONAL PLAINTIFFS GROUP'S MOTION  
FOR LEAVE TO FILE THEIR CONSOLIDATED COMPLAINT**

RYAN JAMES VOLDEN, CHARLES DUPRAZ, VANESSA Z. DEGEORGE, MELISSA GOEKE, JAMES R. CONLEY, NANCY BJORK, TOM KIDWELL, and JEFF VAUGHT, on their own behalves and on behalf of all others similarly situated,

Case No. 05-488-JJF

Plaintiffs,

vs.

INTEL CORPORATION, A DELAWARE CORPORATION,

Defendant.

FICOR ACQUISITION CO., LLC, d/b/a MILLS & GREER SPORTING GOODS, RICHARD CAPLAN, MARIA PILAR SALGADO, PAULA NARDELLA, NANCY WOLFE, LESLIE MARCH, TOM HOBBS, ANDREW MARCUS, and VIRGINIA DEERING, on their own behalves and on behalf of all others similarly situated,

Case No. 05-515-JJF

Plaintiffs,

vs.

INTEL CORPORATION, A DELAWARE CORPORATION,

Defendant.

BILL RICHARDS, CARL YAMAGUCHI, and RON TERRANOVA on their own behalves and on behalf of all others similarly situated,

Case No. 05-672-JJF

Plaintiffs,

vs.

INTEL CORPORATION, A DELAWARE CORPORATION,

Defendant.

DAVID KURZMAN, on behalf of himself and all others similarly situated,

Plaintiff,

vs.

INTEL CORPORATION, A DELAWARE CORPORATION,

Defendant.

Case No. 05-710-JJF

GIACOBBE-FRITZ FINE ART LLC, on its own behalf and on behalf of all others similarly situated,

Plaintiff,

vs.

INTEL CORPORATION, A DELAWARE CORPORATION,

Defendant.

Case No. 05-846-JJF

**THE NATIONAL PLAINTIFFS GROUP'S MOTION  
FOR LEAVE TO FILE THEIR CONSOLIDATED COMPLAINT**

The plaintiffs comprising the National Plaintiffs Group,<sup>1</sup> by their counsel, respectfully move the Court for an Order granting them leave to file their Consolidated Complaint, a copy of

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<sup>1</sup> The National Plaintiffs Group is comprised of the following named plaintiffs (identified by state), in each of following actions, filed in this Court: **(a)** Jim Kidwell (Arizona), Mary Reeder (Ohio), John Maita (New Jersey), JWRE, Inc. (Nebraska), Chrystal Moeller (Nebraska), and Caresse Harms (Nebraska), named plaintiffs in *Kidwell, et al. v. Intel Corp.*, No. 05-470, filed in the District of Delaware on July 6, 2005; **(b)** Robert J. Rainwater (Michigan), Kathy Ann Chapman (Minnesota), and Sonia Yaco (Wisconsin), named plaintiffs in *Rainwater, et al. v. Intel Corp.*, Case No. 05-473, filed in the District of Delaware on July 7, 2005; **(c)** James Volden (Iowa), Charles Dupraz (South Dakota), Vanessa Z. DeGeorge (North Carolina), Melissa Goeke (Maine), James R. Conley (North Dakota), Nancy Bjork (North Dakota), Tom Kidwell (Kansas), and Jeff Vaught (Kansas), named plaintiffs in *Volden, et al. v. Intel Corp.*, Case No. 05-488, filed in the District of Delaware on July 13, 2005; **(d)** Ficor Acquisition Co., LLC, dba Mills & Greer Sporting Goods (Vermont), Richard Caplan (Washington, D.C.), Maria Pilar Salgado (Florida), Paula Nardella (Massachusetts), Nancy Wolfe (Alabama), Leslie March (Louisiana), Tom Hobbs (Tennessee), Andrew Marcus (New York), and Virginia Deering (West Virginia), named plaintiffs in *Ficor Acquisition Corp., et al. v. Intel Corp.*, Case No. 05-515, filed in the District of Delaware on July 21, 2005; **(e)** Bill Richards (Mississippi), Ron Terranova (Nevada), and Carl Yamaguchi (Hawaii), in the action captioned *Richards, et al. v. Intel Corp.*, No. 05-672, filed in the District of Delaware on September 14, 2005; **(f)** David Kurzman, in the action captioned *Kurzman v.*

which is appended hereto as Exhibit A. The grounds for this motion are set forth in the accompanying memorandum of law contemporaneously filed in support thereof.<sup>2</sup>

**DATED:** May 2, 2006

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***Intel Corp.***, No. 05-710, filed in the District of Delaware on September 29, 2005; and **(g)** Giacobbe-Fritz Fine Art LLC (New Mexico), in the action captioned ***Giacobbe-Fritz Fine Art LLC v. Intel Corp.***, No 05-846 (JJF), filed in the District of Delaware on December 7, 2005, and is supported by each of the 22 law firms listed on the signature block at the end of this pleading.

<sup>2</sup> Should the Court grant the National Plaintiffs Group's motion and the National Plaintiffs' Group is permitted to file its proposed Consolidated Complaint, the National Plaintiffs Group will separately move to withdraw Mary Reeder and Nancy Wolfe from this action.

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